

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN COUNCIL OF LEARNED
SOCIETIES, *et al.*,

Plaintiffs,
v.

MICHAEL MCDONALD, in his official
capacity as Acting Chairman of the National
Endowment for the Humanities, *et al.*,

Defendants.

Case No. 1:25-cv-03657

DECLARATION OF CATHERINE NORRIS


I, Catherine Norris declares as follows:

1. I, Catherine Norris, am Associate Dean of the Faculty for Academic Programs and Research at Swarthmore College.
2. Swarthmore College is a member of the American Council of Learned Societies.
3. Swarthmore College and its faculty members regularly apply for grants from various NEH grant programs. For example, the College or its faculty recently received the following grants from NEH:
 - a. “Navajo Language Digital Resource Development with Elders and Veteran Language Teachers Training Student Interns” from the Preservation and Access: Documenting Endangered Languages program (2023)
 - b. “Digitizing the Sound and Sight of American Women’s Work for Peace and Justice” from the Preservation and Access: Humanities Collections and Reference Resources Program (2019),

- c. “Hidden in Plain View: The Music of Holocaust Survival in Poland's First Postwar Feature Film” from the Research Programs: Fellowships for University Teachers Program (2016)
4. I recently learned that NEH terminated several grant programs to which Swarthmore College and its faculty had applied in the past and would have applied to in the future had the programs remained in place. These include the following programs: Humanities Connections, Digital Humanities Advancement Grants, Dangers and Opportunities of Technology, Research and Development, Humanities Collections and Reference Resources, and Institutes for Higher Education Faculty.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 6, 2025 in Swarthmore, Pennsylvania.

Signed by:

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Catherine Norris